

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WALTER E. RYAN, JR., derivatively on behalf  
of CITIGROUP, INC.,

Plaintiff

v.

CHARLES PRINCE, ROBERT E. RUBIN, SIR  
WINFRIED BISCHOFF, ROBERT DRUSKIN,  
WILLIAM R. RHODES, SALLIE L.  
KRAWCHECK, DAVID C. BUSHNELL,  
STEVEN J. FREIBERG, JOHN C. GERSPACH,  
MICHAEL S. HELFER, MICHAEL KLEIN,  
STEPHEN R. VOLK, LEWIS B. KADEN,  
GARY CRITTENDEN, RICHARD D.  
PARSONS, FRANKLIN A. THOMAS,  
KENNETH T. DERR, C. MICHAEL  
ARMSTRONG, JOHN M. DEUTCH, ALAIN  
J.P. BELDA, ROBERTO HERNANDEZ  
RAMIREZ, GEORGE DAVID, ANNE M.  
MULCAHY, JUDITH RODIN, ANDREW N.  
LIVERIS, ROBERT L. RYAN, THOMAS G.  
MAHERAS,

Defendants,

CITIGROUP, INC., a Delaware Corporation,

Nominal Defendant.

No.1:07-cv-11581-SHS

**Motion to Admit Counsel  
*Pro Hac Vice***

FILED  
U.S. DISTRICT COURT  
2008 JAN 31 PM 4:08  
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Court for the Southern District of New York, I, Christopher Marlborough, a member in  
good standing of the bar of this Court, hereby move for an Order allowing the admission  
*pro hac vice* of:


Jeffrey M. Salas, Esq.  
KRISLOV & ASSOCIATES, LTD.  
20 North Wacker Drive, Suite 1350  
Chicago, IL 60606  
Telephone: 312-606-0500  
Facsimile: 312-606-0207

640173 \$25 1-31-08 M&

Jeffrey M. Salas, Esq., is a member in good standing of the Bar of the State of Illinois, as it is evidenced by the annexed certificates. There are no pending disciplinary proceedings against Jeffrey M. Salas, Esq., in any State or Federal Court.

Dated: January 31, 2008  
New York, NY

Respectfully submitted:

By:   
Christopher Marlborough  
SDNY Bar Code: CM-6107  
FARUQI & FARUQI, LLP  
369 Lexington Avenue, 10<sup>th</sup> Floor  
New York, NY 10017-6531  
Telephone: 212-983-9330  
Facsimile 212-983-9331

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WALTER E. RYAN, JR., derivatively on behalf  
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Plaintiff

v.

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No.1:07-cv-11581-SHS

**Affidavit of  
Christopher Marlborough in  
Support of Motion to Admit  
Counsel *Pro Hac Vice***

State of New York     )  
                                  ) ss:  
County of New York    )

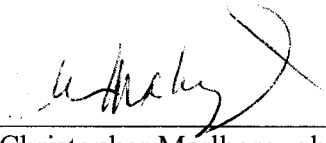
Christopher Marlborough, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at FARUQI & FARUQI, LLP, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein in support of Plaintiff's motion to admit Jeffrey M. Salas, Esq., as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bars of the states of New York, New Jersey and Florida, and was admitted to practice law in the state of New York on April 21, 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Mr. Salas is an attorney at Krislov & Associates, Ltd., Chicago, Illinois.
4. I have found Mr. Salas to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Jeffrey M. Salas, Esq., *pro hac vice*.
6. I respectfully submit a proposed order granting the admission of Jeffrey M. Salas, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jeffrey M. Salas, Esq., *pro hac vice*, to represent Plaintiff in the above-captioned matter, be granted.

Dated: January 31, 2008  
New York, NY

  
\_\_\_\_\_  
Christopher Marlborough  
SDNY Bar Code: CM-6107

Sworn to before me this  
31<sup>st</sup> day of January, 2008

  
\_\_\_\_\_  
Notary Public

**RICHARD DANIEL SCHWARTZ**  
Notary Public, State of New York  
Qualified in Queens County  
Commission Expires April 30, 2011

# Exhibit A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WALTER E. RYAN, JR., derivatively on behalf  
of CITIGROUP, INC.,

Plaintiff

v.

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MULCAHY, JUDITH RODIN, ANDREW N.  
LIVERIS, ROBERT L. RYAN, THOMAS G.  
MAHERAS,

Defendants,

CITIGROUP, INC., a Delaware Corporation,

Nominal Defendant.

No.1:07-cv-11581-SHS

**Order for Admission  
*Pro Hac Vice*  
on Written Motion**

Upon the motion of Christopher Marlborough, attorney for Plaintiff Walter E.

Ryan, and said sponsor attorney's affidavit in support:

**IT IS HEREBY ORDERED** that

Jeffrey M. Salas, Esq.  
KRISLOV & ASSOCIATES, LTD.  
20 North Wacker Drive, Suite 1350  
Chicago, IL 60606  
Telephone: 312-606-0500  
Facsimile: 312-606-0207  
[jeff@krislovlaw.com](mailto:jeff@krislovlaw.com)

is admitted to practice *pro hac vice* for Plaintiff Walter E. Ryan in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (“ECF”) system, counsel shall immediately apply for an ECF password at [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2008  
New York, NY

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United States District Judge



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION  
of the  
SUPREME COURT OF ILLINOIS

One Prudential Plaza  
130 East Randolph Drive, Suite 1500  
Chicago, IL 60601-6219  
(312) 565-2600 (800) 826-8625  
Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333  
Springfield, IL 62701  
(217) 522-6838 (800) 252-8048  
Fax (217) 522-2417

Jeffrey M. Salas  
Krislov & Associates, Ltd.  
Civic Opera Building, Suite 1350  
20 North Wacker Drive  
Chicago, IL 60606

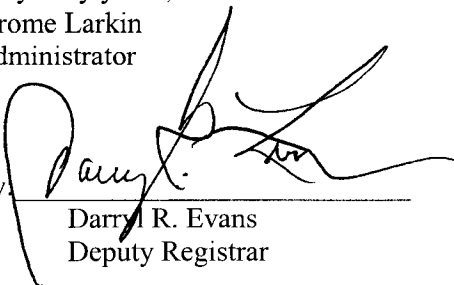
Chicago  
Wednesday, January 30, 2008

In re: Jeffrey Michael Salas  
Admitted: 11/9/2006  
Attorney No. 6290649

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,  
Jerome Larkin  
Administrator

By   
Darryl R. Evans  
Deputy Registrar

DRE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of January, 2008, I caused true and correct copies of the within Motion to Admit Counsel *Pro Hac Vice* and Affidavit of Christopher Marlborough in Support of Motion to Admit Counsel *Pro Hac Vice* to be served upon the following by depositing the same, enclosed in a properly addressed postage paid envelope, in an official depository maintained by the United States Postal Service in the State of New York:

WACHTELL, LIPTON, ROSEN & KATZ

Lawrence B. Pedowitz

George T. Conway III

Jonathan M. Moses

John F. Lynch

51 West 52<sup>nd</sup> Street

New York, NY 10019-6150

*Attorneys for defendants Citigroup Inc., C. Michael Armstrong, Alain J.P. Belda, Sir Winfried Bischoff, George David, Kenneth T. Derr, John M. Deutch, Andre N. Liveris, Anne M. Mulcahy, Richard D. Parsons, Roberto Hernandez Ramirez, Judith Rodin, Robert E. Rubin, Robert L. Ryan, and Franklin A. Thomas*

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Brad S. Karp

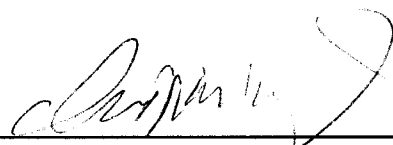
Richard A. Rosen

Lewis R. Clayton

1285 Avenue of the Americas

New York, NY 10019-6064

*Attorneys for defendants Citigroup Inc., Charles Prince, Robert Druskin, William R. Rhodes, Sallie L. Krawcheck, David C. Bushnell, Steven J. Freiberg, John C. Gerspach, Michael S. Helfer, Michael Klein, Stephen R. Volk, Lewis B. Kaden, Gary Crittenden, and Thomas G. Maheras*

  
\_\_\_\_\_  
Christopher Marlborough